

The Honorable Richard A. Jones

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

UNITED STATES OF AMERICA,  
Plaintiff,

v.

JESSICA LAUREN ROBINS,  
Defendant.

NO. CR22-186RAJ

STIPULATED PROTECTIVE ORDER

This matter, having come to the Court's attention on the Stipulated Motion for Protective Order, and the Court, having considered the motion, and being fully advised in this matter, hereby enters the following PROTECTIVE ORDER:

1. **Protected Material.** The material that is described in the Stipulated Motion is deemed "Protected Material."

2. **Production of Protected Material to the Defense.** The United States will make available copies of the Protected Material to defense counsel to comply with the government's discovery obligations. Possession of the Protected Materials is limited to defense counsel, as well as her investigators, paralegals, assistants, law clerks, and experts (collectively, the "members of the defense team"). The members of the defense team may not provide copies of the Protected Material to other persons, including the Defendant herself. In addition, before providing any Protected Material to the members

1 of the defense team, defense counsel is required to provide a copy of this Protective  
2 Order to the members of the defense team.

3       **3. Review of Protected Material by Defendant.** The members of the  
4 Defendant's defense team may share and review the Protected Material with the  
5 Defendant. The Defendant is permitted to review the Protected Material in her counsel's  
6 presence or on a computer screen that her counsel may share during remote meetings.  
7 The Defendant is prohibited from retaining a copy of the Protected Material or from  
8 disseminating the discovery.

9       **4. Limits on Dissemination of Protected Materials.** The members of the  
10 defense team acknowledge that providing copies of the Protected Material to the  
11 Defendant and other persons is prohibited, and agree not to duplicate or provide copies of  
12 the Protected Material to the Defendant and other persons. This order does not limit  
13 employees of the United States Attorney's Office for the Western District of Washington  
14 from disclosing the Protected Material to members of the United States Attorney's  
15 Office, federal law enforcement agencies, witnesses, and the Court and defense as  
16 necessary to comply with the government's discovery obligations.

17       **5. Future Production of Additional Protected Materials.** Additional types  
18 of discovery items may be deemed by the parties to constitute Protected Material upon  
19 agreement, or (if no agreement can be reached) by further order of the Court.

20       **6. No Waiver.** Nothing in this order should be construed as imposing any  
21 substantive discovery obligations on the government that are different from those  
22 imposed by case law and Rule 16 of the Federal Rules of Criminal Procedure. The failure  
23 to designate any material as Protected Material shall not constitute a waiver of a party's  
24 assertion that the materials are covered by this Protective Order.

25       **7. No Ruling on Timing of Production.** This Protective Order does not  
26 require the government to provide particular discovery at a time or in a fashion  
27 inconsistent with applicable law.

1           8.     **No Ruling on Discoverability or Admissibility.** This Protective Order  
 2 does not constitute a ruling on the question of whether any particular material is properly  
 3 discoverable or admissible and does not constitute any ruling on any potential objection  
 4 to the discoverability of any material.

5           9.     **Use of Protected Material in Court.** Any Protected Material that is filed  
 6 with the Court in connection with pre-trial motions, trial, or other matter before this  
 7 Court, shall be filed under seal and shall remain sealed until otherwise ordered by this  
 8 Court. This does not entitle either party to seal their filings as a matter of course. The  
 9 parties are required to comply in all respects with the relevant local and federal rules of  
 10 criminal procedure pertaining to the sealing of court documents.

11          10.    **Violation of Order.** Any person who willfully violates this order may be  
 12 held in contempt of court and may be subject to monetary or other sanctions as deemed  
 13 appropriate by this Court.

14          11.    **Modification of Order.** Nothing in this Stipulation shall prevent any party  
 15 from seeking modification of this Protective Order or from objecting to discovery that it  
 16 believes to be otherwise improper. The parties agree that in the event that compliance  
 17 with this Order makes it difficult for defense counsel to adhere to their Sixth Amendment  
 18 obligations, or otherwise imposes an unworkable burden on defense counsel, she shall  
 19 bring any concerns about the terms of the Order to the attention of the government. The  
 20 parties shall then meet and confer with the intention of finding a mutually acceptable  
 21 solution. In the event that the parties cannot reach such a solution, defense counsel shall  
 22 have the right to bring any concerns about the scope or terms of the Order to the attention  
 23 of the Court by way of a motion.

24          12.    **Non-Termination.** The provisions of this Order shall not terminate at the  
 25 conclusion of this prosecution. Furthermore, at the close of this case, the Protected  
 26 Material shall be returned to the United States, or destroyed, or otherwise stored in a  
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1 manner to ensure that it is not subsequently duplicated or disseminated in violation of this  
2 Protective Order.

3 The Clerk of the Court is directed to provide a filed copy of this Protective Order  
4 to all attorneys of record.

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6 DATED this 6th day of January, 2023.

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9 The Honorable Richard A. Jones  
10 United States District Judge  
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